

## STATEMENT OF BASIS

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0065307  
to discharge to waters of the State of Louisiana.  
AI No.: 11010 / Activity No.: PER20080001

THE APPLICANT IS: CSX Transportation, Inc.  
500 Water Street, J-275  
Jacksonville, FL 32202

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Bonnie Wascom

DATE PREPARED: May 23, 2008

### 1. PERMIT STATUS

- A. LPDES permit – LA0065307  
LPDES permit effective date: October 1, 2003  
LPDES permit expiration date: September 30, 2008
- B. LWDPS permit – NA  
LWDPS permit effective date: NA  
LWDPS permit expiration date: NA
- C. Date Application Received: March 18, 2008

### 2. FACILITY INFORMATION

#### A. FACILITY TYPE/ACTIVITY – rail yard

The previous permit covered discharges from CSX Transportation (rail yard) and CSX Intermodal (trucking facility). It has been determined that there are no discharges coming from the CSX Intermodal facility to the CSX Transportation facility; therefore, CSX Intermodal was not considered in this permit renewal.

This is an existing railroad maintenance and classification yard where locomotives are serviced and trains are assembled. The process wastewater from the equipment maintenance and washdown wastewater, treated petroleum contaminated groundwater, and stormwater from the rail yard flows into the on-site wastewater treatment plant before going to the Inner Harbor Navigation Canal via Almonaster Avenue roadside ditch.

The sanitary wastewater generated by this facility is collected and treated by the local New Orleans wastewater treatment plant.

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B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: III
3. Wastewater Type: II
4. SIC code: 4011

C. LOCATION - 6701 Almonaster Avenue  
New Orleans, Orleans Parish  
Latitude +30° 0' 36", Longitude -89° 59' 36"

3. OUTFALL INFORMATION

**Outfall 001**

**Discharge Type:** Process wastewater from equipment maintenance and washdown, treated petroleum contaminated groundwater, and stormwater

**Treatment:** grit chamber, oil/water separator, equalization basin, dissolved air flotation unit, filtration

**Location:** at the point of discharge from the wastewater treatment facility's effluent pumps prior to mixing with other waters

**Flow:** 0.024 MGD

**Discharge Route:** by pipe to internal ditch, thence to Almonaster Avenue roadside ditch, thence to the Inner Harbor Navigation Canal

**Outfall 003**

**Discharge Type:** Intermittent process wastewater from equipment maintenance and washdown, treated petroleum contaminated groundwater, and stormwater as overflow from the equalization basin

**Treatment:** grit chamber, oil/water separator, equalization basin

**Location:** at the point of discharge from the equalization basin prior to mixing with other waters

**Flow:** Intermittent

**Discharge Route:** by pipe to internal ditch, thence to Almonaster Avenue roadside ditch, thence to the Inner Harbor Navigation Canal

4. RECEIVING WATERS

STREAM – Outfall 001 & 003 – by pipe to internal ditch, thence to Almonaster Avenue roadside ditch, thence to the Inner Harbor Navigation Canal

BASIN AND SEGMENT – Lake Pontchartrain – Subsegment 041401

DESIGNATED USES:

- a. Primary contact recreation
- b. Secondary contact recreation
- c. Propagation of fish and wildlife

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5. EXISTING EFFLUENT LIMITS

- A. Outfall 001** -- Process wastewater from equipment maintenance and washdown, treated petroleum contaminated groundwater, ballast water, and stormwater from rail yard and intermodal facilities

<u>Pollutant</u>	<u>Limitation</u>	<u>Monitoring</u>
	Mo. Avg.: Daily Max. (mg/l)	
Flow (MGD)	Report: Report	Weekly
TSS	40: 60	Monthly
Oil & Grease	---: 15	Monthly
TOC	---: 50	Weekly*
Benzene	---: 0.005	Weekly*
BTEX	---: 0.100	Weekly*
Lead	---: 0.050	Weekly*
pH (s.u.)	6.0 - 9.0	Monthly

\*After demonstrating permit limit compliance for 12 consecutive months, the measurement frequency for that parameter may be reduced to once per month. If the concentration exceeds the daily maximum limit at any time after the 12 months month period, then sampling for the parameter will increase to once per week until a 4 week compliance period is demonstrated.

- B. Outfall 003** -- Intermittent discharge of process wastewater from equipment maintenance and washdown, treated petroleum contaminated groundwater, ballast water, and stormwater from rail yard and intermodal facilities as overflow from the equalization basin

<u>Pollutant</u>	<u>Limitation</u>	<u>Monitoring</u>
	Mo. Avg.: Daily Max. (mg/l)	
Flow (MGD)	Report: Report	Weekly
TSS	40: 60	1/Discharge Event
Oil & Grease	---: 15	1/Discharge Event
TOC	---: 50	1/Discharge Event
Benzene	---: 0.005	1/Discharge Event
BTEX	---: 0.100	1/Discharge Event
Lead	---: 0.050	1/Discharge Event
pH	6.0 - 9.0 s.u.	1/Discharge Event

6. PROPOSED EFFLUENT LIMITS

BASIS -- See rationale below.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

There was an inspection on **April 11, 2007** that did not find any areas of concern. There are no open, appealed, or pending OES enforcement actions as of **May 23, 2008**. There is no EPA enforcement history on file as of **May 23, 2008**.

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B. DMR Review/Excursions

A DMR review was performed for the period of January 2005-December 2007. For this three year time period 24 DMRs were reviewed for Outfall 001 and 24 DMRs were reviewed for Outfall 003. No excursions were reported for Outfall 001. All DMRs submitted for Outfall 003 indicated "No Discharge".

8. ENDANGERED SPECIES

The receiving waterbodies and discharge are not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

9. 303 (d) LISTED WATERBODIES

Subsegment 041401, New Orleans East Leveed Waterbodies, is listed on LDEQ's Final 2006 303(d) List as impaired for organic enrichment/low DO and pathogen indicators. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the rail yard point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. This facility is not a significant source of pathogen indicators or a significant contributor to organic enrichment/low DO and therefore will not significantly contribute these impairments.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

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12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation  
Office of Environmental Services Public Notice Mailing List

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### Rationale for Water Treatment Plant

1. **Outfall 001** -- process wastewater from equipment maintenance and washdown, treated petroleum contaminated groundwater, and stormwater

<u>Pollutant</u>	<u>Limitation*</u>	<u>Reference</u>
	Mo. Avg: Weekly Avg	
Flow (MPD)	Report: Report	LAC 33:IX.2361.1.1.b
TSS	40: 60	Similar discharges (BPJ)
Oil & Grease	---: 15	Similar discharges (BPJ)
TOC	---: 50	Similar discharges (BPJ)
Benzene	---: 0.005	Similar discharges (BPJ)
BTEX	---: 0.100	Similar discharges (BPJ)
Lead	---: 0.050	Similar discharges (BPJ)
pH	6.0 - 9.0 s.u.	Similar discharges (BPJ)

**Treatment:** grit chamber, oil/water separator, equalization basin, dissolved air flotation unit, filtration

**Monitoring Frequency:** The monitoring frequency for all parameters has been reduced to once per month because consistent compliance has been demonstrated. Monitored at the point of discharge from the wastewater treatment facility's effluent pumps prior to mixing with other waters.

2. **Outfall 002** -- Intermittent process wastewater from equipment maintenance and washdown, treated petroleum contaminated groundwater, and stormwater as overflow from the equalization basin

<u>Pollutant</u>	<u>Limitation*</u>	<u>Reference</u>
	Mo. Avg: Daily Max	
Flow (GPD)	Report: Report	LAC 33:IX.2361.1.1.b
TSS	40: 60	Similar discharges (BPJ)
Oil & Grease	---: 15	Similar discharges (BPJ)
TOC	---: 50	Similar discharges (BPJ)
Benzene	---: 0.005	Similar discharges (BPJ)
BTEX	---: 0.100	Similar discharges (BPJ)
Lead	---: 0.050	Similar discharges (BPJ)
pH	6.0 - 9.0 s.u.	Similar discharges (BPJ)

**Treatment:** grit chamber, oil/water separator, equalization basin

**Monitoring Frequency:** Once per discharge event for all parameters at the point of discharge from the equalization pond prior to mixing with other waters.

**\*Limits Justification:** For all parameters, limits and monitoring frequencies are based on previous permit and existing permits for similar discharges.

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BPJ Best Professional Judgment  
MGD Million Gallons per Day  
s.u. Standard Units

NOTE:

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

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Pollution Prevention Plan (PPP) Requirement

A PPP is included in the permit since there is a potential for contamination from processes including equipment wash wastewater and chemicals stored on site.

The PPP shall be updated and maintained within sixty days from the effective date of the final permit. The plan should identify potential sources of pollution and ensure the implementation of practices to prevent and reduce pollutants in discharges associated with industrial activity at the facility (see narrative requirements of the Draft Permit).

